

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Connie and Albert Balderson)
)
) Case No. 16-31532-KRH
)
)
) Chapter 7
Debtor(s))
Address 2302 Coan Stage Rd.)
Heathsville, VA 22473)
Last four digits of SSN(s): 7806 & 8203)
)
)
)
)

**NOTICE OF MOTION TO EXPEDITE HEARING and
NOTICE OF MOTION TO Extend Time to File Reaffirmation
Agreement and Statement in Support of Reaffirmation Agreement**

Connie and Albert Balderson have filed papers with the court to Expedite Hearing and to Extend Time to File Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before 7/13/2016, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- X** Attend the hearing on the motion scheduled to be held July 13, 2016 at 12:00 p.m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5000 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 7/11/2016

Signature, name, address, and telephone
number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.
America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294
Virginia State Bar No. 29640
Counsel for Albert & Connie Balderson

Certificate of Service

I hereby certify that I have this 11th day of July, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

Creditors

Basic Auto Sales

11371 Washington Highway
Ashland, VA 23005-0000

Calvary Portfolio Services

500 Summit Lake Dr
Ste 400
Valhalla, NY 10595-0000

Capital One

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0000

CashnetUSA

attn: Bankruptcy
175 W Jackson Blvd Ste 1000

Chicago, IL 60604-0000

Cindy Balderson

262 Norman's Corner Rd
Farnham, VA 22460-0000

Cntry Door

Attn:Bankruptcy
PO Box 2830
Monroe, WI 53566-0000

Comenity Bank

PO Box 182124
Columbus, OH 43218-0000

Convergent Outsourcing Inc

800 SW 39th St
PO Box 9004
Renton, WA 98057-0000

Credit Acceptance

25505 West 12 Mile Rd
Suite 3000
Southfield, MI 48034-0000

Credit Control Corp

PO Box 120568
Newport News, VA 23612-0000

Credit Control Corporation

PO Box 120568
Newport News, VA 23612-0000

Dillard Associates PC

229 Prince Street
P.O. Box 356
Tappahannock, VA 22560-0000

DirectTV

attn: Bankruptcy Claims
PO Box 6550
Englewood, CO 80155-6550

Fingerhut

6250 Ridgewood Rd
St Cloud, MN 56303-0000

Ford Motor Credit

PO Box 62180
Colorado Springs, CO 80962-0000

Ford Motor Credit Company LLC

c/o Carl A. Eason, Esquire
200 Bendix Road, Suite 300
Virginia Beach, VA 23452

GE Capital Retail Bank

attn: Bankruptcy Dep't

P.O. Box 1950

Morristown, NJ 07962-1950

Ginnys/Swiss Colony Inc

1112 7th Ave
Monroe, WI 53566-0000

GMAC

now: Ally Financial
PO Box 380901
Minneapolis, MN 55438-0000

Heathesville Animal Clinic

45 Back Street
Heathsville, VA 22473-0000

HFC

PO Box 8873
Virginia Beach, VA 23450-8873

Internal Revenue Service

Insolvency Unit
PO Box 7346
Philadelphia, PA 19101-7346

Kalbaugh, Pfund & Messersmith

901 Moorefield Park Dr.
Ste 200
Richmond, VA 23236-0000

Lexington Consumer Advocacy LL

c/o Customer Care Dep't
337 Garden Oaks Blvd
Houston, TX 77018-0000

MCV Associated Physicians

830 E Main St
Suite 1900
Richmond, VA 23219-0000

Midland Credit Management

8875 Aero Dr, Ste 200
San Diego, CA 92123-0000

Montgomery Ward Credit

3650 Milwaukee St
Madison, WI 53714-0000

Nc Financial

175 W Jackson Blvd
Chicago, IL 60604-0000

NCC

5503 Cherokee Ave
Alexandria, VA 22312-0000

Net Credit

200 W Jackson Blvd

Suite 2400
Chicago, IL 60606-0000

Onward Credit Customer Support
505 N LaSalle St.
Suite 550
Chicago, IL 60654-0000

Pelletteri
1717 Park St
Naperville, IL 60563-0000

Peter S Lake, Esq.
4445 Corporation Lane
Suite 155
Virginia Beach, VA 23462-0000

Rappahannock General Hospital
PO Box 1449
Kilmarnock, VA 22482-0000

Riverside Emergency Phys
PO Box 1929
Kilmarnock, VA 22482-1929

Riverside Health System
Riverside Tappahannock Hospita
PO Box 6008
Newport News, VA 23606-0008

Riverside Health System
PO Box 2858
Raleigh, NC 27602-0000

Seventh Avenue
re: Bankruptcy Dep't
112 7th Ave
Monroe, WI 53566-1364

Springlf Fin

601 Nw 2nd St
Evansville, IN 47708-0000

TD Auto Finance LLC
27777 Inkster Rd.
Farmington, MI 48334-0000

Terry Hatcher
2302 Coan Stage Rd
Heathsville, VA 22473-0000

Usda Rural Development
P.O. Box 790170
St Louis, MO 63179-0000

VCU Health System -- MCV Hosp.
Set-off Debt Section
PO Box 980462
Richmond, VA 23298-0462

Verizon
500 Technology Dr Ste 30
Weldon Spring, MO 63304-0000

Verizon
500 Technology Dr
Suite 500
Weldon Spring, MO 63304-0000

Virginia Department of Taxatio
PO Box 2156
Richmond, VA 23218-0000

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Connie and Albert Balderson
Debtor(s)

Case No.: 16-31532-KRH
Chapter 13

MOTION FOR AN EXPEDITED HEARING

NOW COMES the Debtor, Connie and Albert Balderson, by counsel, to submit the following Motion for an Expedited Hearing under 11 U.S.C. §362 to allow the Debtors to Extend Time to File Reaffirmation Agreement pursuant to 11 U.S.C. §362 (c)(3)(B).

The Debtor(s) request that court Extends Time to File Reaffirmation Agreement, and in support of this Motion states the following:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 157 and 1334 and 11 U.S.C. § 362, and this matter is a core proceeding under the Bankruptcy Code.
2. On 3/29/2016, the Debtor(s) filed in this Honorable Court a petition for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the "instant case"). Peter Barrett was appointed to serve as Chapter 13 trustee in this case (the "Trustee").
3. The initial Trustee Meeting was held on 5/2/2016.
4. Time to file Reaffirmation Agreement expired on July 1, 2016.
5. Time is of the essence in this matter because the Creditor, Ford Motor Company, has already repossessed the vehicle. In order to release the vehicle back to the Debtors, the Creditor wants the reaffirmation agreement completed. Debtors require two vehicles to get to work, as they work more than thirty minutes apart.

WHEREFORE, the Plaintiff prays that this Honorable Court allow the Debtor(s) to obtain an extension of the automatic stay pursuant to 11 U.S.C. §362(c)(3)(B) and grant an Expedited Hearing and any such other relief as may be deemed just and proper by this Honorable Court.

RESPECTFULLY SUBMITTED:

Counsel for
Albert and Connie Balderson
By: /s/ Richard J. Oulton
Richard J. Oulton, Esq.
VSB # 29640
8501 Mayland Dr. Ste 106
Henrico, VA 23294
804-308-0051 (ph)
804-308-0053 (fax)

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1 UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN THREE BUSINESS DAYS OF THE SERVICE OF THIS MOTION TO EXPEDITE HEARING, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND CONCEDED AND ISSUE AN ORDER SUSTAINING THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

CERTIFICATE OF SERVICE

I certify that on 7/11/2016, a copy of the above Motion to Expedite Hearing has been mailed via first class mail or via electronic means to Peter Barrett, Trustee, the United States Trustee, counsel listed as follows, and all creditors set forth on the attached mailing matrix.

/s/ Richard J. Oulton
Richard J. Oulton, Esq.

Creditors

Basic Auto Sales

11371 Washington Highway
Ashland, VA 23005-0000

Calvary Portfolio Services

500 Summit Lake Dr
Ste 400
Valhalla, NY 10595-0000

Capital One

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0000

CashnetUSA

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Chicago, IL 60604-0000

Cindy Balderson

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Cntry Door

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25505 West 12 Mile Rd
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Credit Control Corp

PO Box 120568
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6250 Ridgewood Rd
St Cloud, MN 56303-0000

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Ford Motor Credit Company LLC

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HFC

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Insolvency Unit
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Philadelphia, PA 19101-7346

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Houston, TX 77018-0000

MCV Associated Physicians

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Suite 550
Chicago, IL 60654-0000

Pelletteri

1717 Park St
Naperville, IL 60563-0000

Peter S Lake, Esq.

4445 Corporation Lane
Suite 155
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PO Box 1929
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Riverside Health System

Riverside Tappahannock Hospita
PO Box 6008
Newport News, VA 23606-0008

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112 7th Ave
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Evansville, IN 47708-0000

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